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AN ENVIRONMENTAL LAW PRACTICE

APR 1 9 200

April 18, 2005

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#### Via Certified Mail - Return Receipt Requested

Mr. Chuck Schadel (32P31)
U.S. Environmental Protection Agency
Water Protection Division
Office of Compliance and Enforcement
NPDES Branch
1650 Arch Street
Philadelphia, PA 19103

Re: Request for Information Pursuant to Section 308 of the Clean Water Act Issued to Hovnanian Enterprises, Inc.

Dear Mr. Schadel:

In conformance with our several discussions regarding the scope and phasing of a response to the Request for Information Pursuant to Section 308 of the Clean Water Act (the "Section 308 Request") sent by the U.S. Environmental Protection Agency ("EPA") to Hovnanian Enterprises, Inc., enclosed please find a response to Question 1.a. through 1.f., inclusive, and Questions 4 and 5, along with a set of General Qualifications and Objections.

Please note that the enclosed response is submitted to EPA pursuant to a claim of "Confidential Business Information," and each document has been marked as such. All of the information contained herein, and/or the manner in which the information has been presented, is confidential, and its disclosure would cause substantial harmful affects to the business's competitive position.

As you will also note, I have concurrently set a copy of this letter and the enclosure to Nina Rivera, Esquire of your office.

Mr. Chuck Schadel (32P31) April 18, 2005 Page 2

Please call me if you should have any questions regarding this submission.

Jonathan E. Rinde

For MANKO, GOLD, KATCHER & FOX, LLP

JER/pc Enclosure

cc: Nina Rivera, Esquire (w/enclosure)

- 1. Provide the following information for all construction sites active from January 1, 2001 to the present, which meet or exceed the size criteria, at which Hovnanian Enterprises, Inc. (Hovnanian), or any associated business is, or has been an owner, operator, developer, lessor, lessee, general contractor and/or subcontractor at any time:
- a. The name of each construction site located in the States of Delaware, Maryland, Pennsylvania, Virginia or West Virginia, or the District of Columbia;
  - b. The corresponding address for each construction site;
  - c. The corresponding area of disturbance for each construction site;
  - d. The corresponding dates of construction activity for each site;
  - e. Confirmation of NPDES permit coverage;
- f. Confirmation that a plan for managing erosion and sediment had or is approved.

Response: Nina Rivera of EPA clarified that, for the purposes of this response, only "traditional" developments were required to be identified at this time and no documents were required to be supplied. Traditional developments were defined as developments where a responding entity is both the owner and developer of the entire site, as well as the homebuilder. Operating entities also perform custom homebuilding of single homes on lots owned by the customer. Given the generally small size of the earth disturbance associated with these projects, custom homebuilding construction sites are not included in this response.

We have interpreted this request to require the identification of projects that were active (e.g., under construction) at any time between January 1, 2001 to the present, rather than limiting the response to only those projects that were active during this entire time period. Attached hereto as Exhibit "1" please find (a) a list of projects that is responsive to this request, and (b) accompanying Certifications from a representative of the responding operating entity. Please note that separate operating entities who have responded to this question are also identified on Exhibit "1." Hovnanian Enterprises, Inc. is a holding company of the equity interests of numerous subsidiaries who operate in a decentralized manner with business groups operating independently and entrepreneurially. The business groups are further organized into divisions, within which there are operating entities, which are individually in charge of all aspects of site preparation and home construction for the community(ies) they build. The operating entities responding to this question are organized into seven (7) different divisions, which in turn are organized into two (2) different business groups, within the jurisdictions set forth in this question.

Much effort has been made within the short time period allotted to provide a complete response to this question; however, with the number of projects identified as responsive to this request, some of the records that contain responsive information may not yet be found, or may be permanently lost or destroyed. In these instances, an asterisk (\*) appears in the appropriate

column in Exhibit "1." The responding operating entities will continue to undertake reasonable efforts to locate any additional existing records that could provide additional information responsive to this request.

The Section 308 Request asks, at Question 1.c., for the "area of disturbance" for each construction site. In many instances, only the size of the development is known, not the "area of disturbance," which is generally smaller in size than the size of the development. In these instances, the size of the entire development site has been given under the column labeled "Acres" on Exhibit "1."

In addition, please note that the responding entities have, in certain instances, responded to Question 1.d., which asks for the date of "construction activity," by making good faith approximations of the dates certain projects were under construction. This time period may include the time after the site has been stabilized, but while homebuilding still continues.

Questions 1.e. and 1.f. of the Section 308 Request ask, respectively, for "confirmation of NPDES coverage" and "confirmation that a plan for managing erosion and sediment had or is approved." In response to the first of these questions, the responding entities have provided, when available and identified in the limited time to provide a response, the NPDES permit number for each project. With respect to the second of these questions, review and approval of an erosion and sedimentation control plan is typically performed by a local or county jurisdiction, and approved is granted via a letter. Although the time limitations of the response have precluded the collection of all such approval letters, the date of the approval letter is provided, when available, in the column labeled "E&S Plan Approval" on Exhibit "1."

In addition to counsel, the persons consulted with respect to this question include those project managers of the responding entities who have certified to this response. As you will note, in certain instances, a project manager has inserted the limitation of personal knowledge to the certification - please be advised that each project manager who signs the certification is doing so based upon his or her personal knowledge. As set forth above, no documents are required to be identified or submitted with this response at this time.

4. List any other site not already listed in under Question 3 [sic], which Hovnanian, and/or associated businesses plan to own, operate, develop, lease, let or act as general contractor or subcontractor within the next one (1) year, and in which construction activity is expected to disturb more than one acre. List only sites in States of Delaware, Maryland, Pennsylvania, Virginia or West Virginia, or the District of Columbia.

Response: Nina Rivera of EPA clarified that this question referred to the list generated in response to Question 1, rather than Question 3.

The responding operating entities have identified the following communities as those which may begin construction in the next twelve (12) months in the jurisdictions set forth in the Section 308 Request, and in which construction activity is expected to disturb more than one (1) acre. Consistent with the response set forth to Question 1, the following communities are those in which a responding operating entity will be a "traditional" developer (e.g., the owner and developer of the entire site, as well as the homebuilder), and excludes sites of custom homebuilding of single homes. (Each community is listed generally according to the trade name given to it.)

Fieldstone, Lower Makefield, PA
Four Seasons at Elm Tree, Rapho Twp, PA
Four Seasons at Morgan Creek, Quakertown, PA
Four Seasons at Springfield, Springfield, PA
Philadelphia Coke, Philadelphia, PA
Scammels Corner, Lower Makefield, PA
Valley View, Lower Moreland, PA

Brandywine Greens, Prince Georges Co., MD
Enyart (a.k.a. Orchard Crossing), Arnold, MD
Estates at Woodyard Farms, Prince Georges Co., MD
Four Seasons at Kent Island, Chester, MD
Hillcrest Reserve, Catonsville, MD
Mannington, Prince Georges Co., MD
Monticello, Ann Arundel Co.,
Myers/Rawle (Four Seasons at St. Margarets), Baltimore County, MD
Patapsco Landing I, Howard County, MD
Patapsco Landing II, Howard County, MD
Patapsco Landing III, Howard County, MD
Patuxent Overlook, Prince Georges Co., MD
Rolling Oak, Baltimore Co., MD
The Smith Property, Prince Georges Co., MD

Ashland 25, VA Ashland Cottages, VA Banyon Cove, Loudoun County, VA Brittany Estates, VA Carriage Hills, VA

Cobblestone Square, VA Crippen Estates, Fairfax County, VA Eagles Pointe 2, VA Eagles Pointe 4, VA Eagles Pointe 5, VA England Run 16, VA England Run 17, VA Forest View, Loudoun County, VA Jackson Fields, VA Katies Grove, VA Lake Terrapin 10, VA Lee's Ridge (Panorama Terrace), Jefferson County, WV Moler (Liberty Run), Berkley County, WV Ridgeview Estates, VA Rose Estates (Ray Property), Culpepper County, VA Riverwalk, VA Saratoga Springs, VA Summerwood 4, VA Summerwood 5, VA The Glen, VA

Emerson Park, DC

Stonewater Creek, Millsboro, DE Retreat at Millstone, Millsboro, DE Blackwater Crossing, Cambridge, MD Nassau Grove, Lewes, DE

Please note that the list of projects set forth above is dynamic, based on a wide variety of unrelated factors, many of which are out of the control of the responding operating entities, such as land availability, market-demand and interest rates. Therefore, although the responding operating entities have made a good faith attempt to list all of the communities responsive to this request at this time, it must be understood that there could be additions, deletions or changes to this list immediately following this submittal to EPA. Because of the dynamic nature of this list, it would be futile to attempt to continually provide EPA with current information responsive to this request, and no such attempt will be made. The responding operating entities will, however, continue to cooperate with EPA with respect to appropriate requests for information.

In addition to counsel, the persons consulted with respect to this question include the project managers of the responding entities who have executed the certification to the response to Question 1. Given the breadth of this question, no single individual was identified who had personal knowledge over the entire response. Other than privileged communications, the documents consulted with respect to this response include materials that make up the business plans of the responding entities. Since the materials that make up the business plans are confidential business information which primarily include information unrelated to the Section

308 request, copies of the materials that make up the business plans are not attached to this submission, but will be made available for inspection by EPA representatives upon request.

5. Submit a copy of any standard operating procedures or protocols utilized by Hovnanian and/or any associated business, for assuring that it or its contractors, agents or representatives timely obtain and implement any permit required by the Clean Water Act, any applicable State law regarding discharges into water and/or ay applicable State law on erosion and sedimentation control.

The phrase "standard operating procedure" and the term "protocols" as used in Response: this question could be interpreted various ways. In response to this question, the responding operating entities offer the following background and information. As set forth above, Hovnanian Enterprises, Inc. is a holding company of the equity interests of numerous subsidiaries who operate in a decentralized manner with business groups operating independently and entrepreneurially. The business groups are further organized into divisions, within which there are operating entities, which are individually in charge of all aspects of site preparation and home construction for the community(ies) they build. Typically, consulting engineering firms are employed to design each community, and to obtain the required permits and approvals. The engineering firm guides the project through the often times complex approval process. Each jurisdiction (state, county and/or local) is different with respect to its application and interpretation of the NPDES permitting program for construction sites, as well as their review and approval of erosion and sedimentation control plans. At times, jurisdictions have overlapping authority. Therefore, the operating entities confer with the relevant permitting agencies to submit timely applications, receive approvals, and resolve any issues identified by these agencies. It is each operating entity's practice to be in compliance with all applicable legal requirements, despite the complexity of the system and the overlapping jurisdictions and applicable authorities.

The various personnel of the operating entities typically have been involved in the development of numerous communities and have thereby gained the experience and knowledge of the necessary permits and approvals. In addition to this experiential knowledge, in jurisdictions such as Virginia, Certified Professional Land Disturbers, who are licensed by the state and certified to conduct land disturbance activities associated with site preparation and development, are employed by the divisions. The operating entities also require that the prime subcontractors that they hire to perform site clearing, mass grading and site stabilization have copies of all relevant permits, and are contractually tasked with complying with the terms and conditions of these permits. A copy of the form Prime Subcontractor Agreement is attached for your review at Exhibit "5."

In addition to counsel, various community builders and division representatives contributed to the development of this response. Given the decentralized manner of operations, no single individual has the personal knowledge over all of the matters discussed above.

## General Qualifications and Objections to the Information Requested Pursuant to the Section 308 Request.

- a. Hovnanian Enterprises, Inc. and the responding operating entities object to the Section 308 Request in that the questions set forth therein are overbroad, unreasonable, seek to obtain information not related to any objective of the Clean Water Act's permitting program, and are beyond the scope of EPA's authority pursuant to Section 308.
- b. Hovnanian Enterprises, Inc. and the responding operating entities object to the Section 308 Request as it purports to require supplements to these responses in the future if, for example, newly developed information becomes known or if these responses, or any portion thereof, becomes false, incomplete or misrepresentative of the facts. Notwithstanding this objection, the responding operating entities will endeavor to notify EPA if they determine, on the basis on information discovered after the submittal of these responses, that any of these responses are incorrect. However, the responding operating entities will not endeavor to continually provide EPA with current information responsive to Question 4, since the list of projects responsive to that request is dynamic, based on a wide variety of unrelated factors, many of which are out of the control of the responding operating entities.
- c. Hovnanian Enterprises, Inc. and the responding operating entities object to the Section 308 Request in that it seeks to reveal information that is protected from disclosure by the attorney-work product privilege, the privilege associated with attorney-client communications, and/or other applicable privileges.
- d. Hovnanian Enterprises, Inc. and the responding operating entities object to the Section 308 Request as it purports to require the submission of documents to EPA that contain information that is responsive to a question, even though such documents may provide no further information regarding the question other than the response or other documents provided.
- e. Hovnanian Enterprises, Inc. and the responding operating entities object to the Section 308 Request to the extent that it uses terms and phrases that are undefined and can be interpreted in several ways. In each such instance, we have attempted to give the undefined term a common meaning given the context in which the term is used.
- f. Hovnanian Enterprises, Inc. and the responding operating entities submit this information subject to a claim of "Confidential Business Information" as set forth in EPA's regulations. All of the information submitted herein is proprietary and has been, and will continue to be, kept confidential. Release of the information and/or responses contained herein will cause substantial harmful affects to the business's competitive position.

- g. Hovnanian Enterprises, Inc. and the responding operating entities object to the purported requirement that a single individual certify to each or all of the responses. Because of the breadth of the questions posed in the Section 308 Request, in many instances the responses have been derived from information obtained from a number of individuals in different divisions and operating entities, and no one individual has the requisite knowledge covering the entire response. Notwithstanding this objection, the responding operating entities have provided certifications for each project identified in response to Question 1. For responses to Questions 4 and 5, no certification has been provided.
- h. Hovnanian Enterprises, Inc. and the responding operating entities reserve the right to assert additional objections.

Confidential Business Information .

	A	В	С	D	Ε	F	G	H
1	Property Name	Site Location	State	Acres	Dates of Construction	NPDES Permit No.	E&S Plan Approval	Responding Entity
2	Arbor West	Prince Place & Truman Parkway, Prince George's County	MD	13.9	1999-2001	None Obtained	3/27/1996; SC 315-96	Washington Homes Inc.
3	Ashburn Village -(Four Seasons at Ashburn Village) 49A	44460 Chamberlain Terrace, Ashburn	VA	4.9	2004 to Present	Permit Application Submitted		K. Hovnanian's Four Seasons at Ashburn Village, LLC
4	Ashland 27	Spriggs Road and Route 234, Prince William County	VA	32.57	4/2003 - 11/17/2004	None Obtained	2/25/2002	K. Hovnanian Homes of Virginia, Inc.
5	Barrett's Crossing	Jennell Drive and Hassian Hill Court, Prince William County	VA	39.51	Start - 4/2003; Completed	VAR102537	12/17/2002	K. Hovnanian Homes of Virginia, Inc.
6	Barrington Oaks - 5	Alistair Drive and Ethridge Lane, Prince William County	VA	21.78	8/2000 - 8/2001	None Obtained	8/19/1999	K. Hovnanian at PC Homes, Inc.
7	Bealton Station	Remington and Station Roads, Bealton	VA	12.75	May 01 to July 04	VAR102361	6/24/2003	K. Hovnanian Homes of Virginia, Inc.
8	Bellehaven Estates, Sec. 1	St. Joseph's Drive & Ardmore-Ardwick Roads, Prince George's County	MD	22.75	1999 - 2001	None Obtained	8/13/1997; SC 305-97	WH/PR Land Company, LLC
9	Bellehaven Estates, Sec. 2	Ardwick-Ardmore Roads, Prince George's County	MD	17.3	1999 - 2001	None Obtained	1/14/1998; SC 63-98	WH/PR Land Company, LLC

Confidential Business Information -

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1	Property Name	Site Location	State	Acres	Dates of Construction	NPDES Permit No.	E&S Plan Approval	Responding Entity
10	Bowie New Town Center	Mitchellville Rd & Everest Dr., Bowie	MD	12.9	1/1995 - 3/2005	None Obtained	Lavarante de la companya del companya de la companya del companya de la companya	Woodland Lake Condominiums at Bowie New Town, LLC
11	Brandywine (Chaddsford)	Rt. 301 South, Prince George's County	MD	32	2003 to Present	03-PG-0023	3/20/2003; SC 336-03	K. Hovnanian Homes of Maryland, LLC
12	Brandywine at Thornbury	Routes 202 and 926, West Chester	PA	1	9/15/1997 - 10/21/2001	PAS10G203	1/21/1997; 3/13/1997 and 5/15/1997	K. Hovnanian at Thornbury, Inc.
13	Brenbrooke	12414 Purcell Road, Prince William County	VA	67.27	1/2000 - 8/2002	None Obtained	4/14/1998	K. Hovnanian at Brenbrooke, LLC
14	Brentsmill Sec. 1	Telegraph Road, Stafford	VA	78	4/2004 to Present	VAR103799	4/8/2004	K. Hovnanian Homes of Virginia, Inc.
15	Byers Station	231 Eagles Farm Road, Chester Springs	PA	154	10/18/2004 to Present	PAS10G527	3/23/2004	K. Hovnanian at Upper Uwchlan, LLC
16	Cameron Chase 4 (Collier Prop)	Cameron Hunt Place, Ashburn	VA	3.65	3/2000 - 4/2002	None Obtained	Jan-00	K. Hovnanian at PC Homes, Inc.
17	Cameron Station Phase VII	400 Cameron Station Drive, Alexandria	VA	1.9	11/19/2004 to Present	VAR10; Permit Issued	11/19/2004	K. Hovnanian at Cameron Station, LLC

Confidential Business Information :

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1	Property Name	Site Location	State	Acres	Dates of Construction	NPDES Permit No.	E&S Plan Approval	Responding Entity
18	Carriages at Russett, Parcel 13 DR	Russett Green East, Laurel	MD	4.7	4/2005 to Present	OSAA 0071	1/31/2005; SC 544-09	K. Hovnanian Homes at Russett, LLC
19	Cedar Ridge	Stubble Road and Alexandras Grove Drive, Ashburn	VA	24.33	May 03 - Jan 05	VAR101478	9/9/2003	K. Hovnanian Homes of Virginia, Inc.
20	Chancellors Grove (Ewell Property)	Mt. Olive Road, Centreville	VA	5	3/2004 to Present	VAR104658	10	K. Hovnanian Homes of Virginia, Inc.
21	Columbia Town Center (Governors Grant)	Governor Warfield/Broken Land Parkway, Columbia	MD	7.6	2001 to Present	01-HO-0014	5/4/2001	K. Hovnanian at Columbia Town Center, LLC
22	Coppermine Crossing Condos	Coppermine Road (665) and River Birch Road (8161), Oak Hill	VA	16.2	4/04 to Present	VAR103681	4/2/2004	K. Hovnanian at Copper Mine Crossing, LLC
23	Covington, Parcel 5	Collington Rd/Rte. 301, Bowie	MD	13.28	1999 - 2001	None Obtained	5/28/1997; SC 293-97	Washington Homes of Maryland
24	Crawfords Ridge	Waugh Chapen Rd/Riegle Ct., Odenton	MD	5.9	2005 to Present	05-AA-0075	2/1/2005; AASCD 546- 08	K. Hovnanian Homes of Maryland, LLC
25	Deerbrook a/k/a Valley Day School	Mill Road, Yardley	PA	9.76	2/2004 to Present	PAR10D513	12/4/2003	K. Hovnanian at Lower Makefield I, LLC

Confidential Business Information .

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4***	Property Name	Site Location	State	Acres	Dates of Construction	NPDES Permit No.	E&S Plan Approval	Responding Entity
26	Eagle Pointe	Hawkins & Crownsville Rd, Crownsville	MD	14.97	2001 - 2005	01-AA-0033	10/2/2001; AASCD 439- 29	Washington Homes of Maryland, LLC
27	Eagles Pointe 1	U.S. Route 1 and American Eagle Blvd., Woodbridge	VA	27.03	8/2004 to Present	Permit Application submitted	4/21/2004	WHI - Republic, LLC
28	Eagles Pointe 3	U. S. Route 1 and American Eagle Blvd., Woodbridge	VA	33.54	1/2005 to Present	Permit Application Submitted	11/10/2004	WHI - Republic, LLC
29	Eagles Pointe 5 Recreation Center	U.S. Route 1 and American Eagle Blvd., Woodbridge	VA	2.33	12/2004 to Present	Permit Application Submitted	11/2/2004	WHI - Republic, LLC
30	Elm Tree (Four Seasons at)	3121 Mount Joy Road, Mount Joy	PA	5.0+	10/1/2004 to Present	PAG2003603111	1	K. Hovnanian at Rapho, LLC
31	England Run North 18	Allex Court and Lyons Boulevard, Stafford County	VA	19.97	3/2002 - 10/2003	VAR430969		Washington Homes
32	England Run North 19 A	Lyons Boulevard and Stanley Loop Court, Stafford County	VA	11.265	3/2003 - 1/2005	VAR430969		Washington Homes
33	England Run North 19 B & C	Lyons Boulevard and Foggy Field Lane, Stafford County	VA	26.22	10/2003 to Present	VAR430969	6/21/2004	K. Hovnanian Homes of Virginia, Inc.

Confidential Business Information

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1	Property Name	Site Location	State	Acres	Dates of Construction	NPDES Permit No.	E&S Plan Approval	Responding Entity
34	Evergreen	Beaverdam Drive and Ryan Road, Ashburn	VA	18.25	Aug 04 to Present	VAR104533	10/20/03; 2/16/2005	K. Hovnanian Homes of Virginia, Inc.
35	Fairfax Gateway	School Street and 123, Leesburg	VA	5	3/04 to Present	VAR103930	4/13/2004	K. Hovnanian Homes of Virginia, Inc.
36	Farmington	6995 Farmington Drive, Macungie	PA	104	11/2003 to Present	PAS10Q219	5/11/2001	K. Hovnanian at Lower Macungie Township II, LLC
37	Farmwell	43394 Waxpool Road, Ashburn	VA	12.2	Aug 03 to Jan 05	VAR104693	6/17/2002	K. Hovnanian Homes of Virginia, Inc.
38	Forest Run II	Marlboro Pike & Walters Lane, Prince George's County	MD	3.21	2004 to Present	Permit Application Submitted		K. Hovnanian of Forest Run, LLC
39	Four Seasons at Saucon Valley	1842 Caryn Drive, Lower Saucon	PA	31.7	9/1998 - 2002	PAR10U116; renewal of PAS10U002	2/9/1998	K. Hovnanian at Lower Saucon Township II, LLC
40	Four Seasons - Historic Virginia -Phase 1, Section 1	16200 Four Seasons Drive, Prince William County	VA	26	Completed	VAR431057	3/27/2001	K. Hovnanian's Four Seasons at Historic
	Four Seasons - Historic VA - Phase 1, Section 2	16400 Four Seasons Drive, Prince William County	VA	33.3	2002 - Present	VAR431057	11/16/2001	K. Hovnanian's Four Seasons at Historic Virginia

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1	Property Name	Site Location	State	Acres	Dates of Construction	NPDES Permit No.	E&S Plan Approval	Responding Entity
42	Four Seasons - Historic VA -Phase 2, Section 1	17664 Four Seasons Drive, Prince William County	VA	26.47	2002 - Present	VAR431057	1/7/2002	K. Hovnanian's Four Seasons at Historic Virginia
43	Four Seasons - Historic VA - Phase 2, Section 2	3705 DeTrick Trail, Prince William County	VA	30.03	2002 to Present	VAR431057	8/2/2002	K. Hovnanian's Four Seasons at Historic Virginia
	Four Seasons - Historic VA -Phase 3, Section 1	17477 Four Seasons Drive, Prince William County	VA	28.9	2002 to Present	VAR431057		K. Hovnanian's Four Seasons at Historic Virginia
	Four Seasons - Historic VA - Phase 4, Section 1	4001 Lunar Eclipse Drive, Prince William County	VA		4/14/2003 to Present	VAR431057		K. Hovnanian's Four Seasons at Historic Virginia
46	Four Seasons-Historic VA-Phase 5, Section 1	17195 Four Seasons Drive, Prince William County	VA	23	11/10/2003 to Present	VAR431057		K. Hovnanian's Four Seasons at Historic
47	Four Seasons-Historic VA-Phase 6, Sec. 1	16832 Four Seasons Drive, Prince William County	VA		7/21/2004 to Present	VAR101439		K. Hovnanian's Four Seasons at Historic Virginia
48	Four Seasons-Historic VA-Phase 5, Section 2	3667 Secret Grove Court, Prince William County	VA		3/16/2004 to Present	VAR431057		K. Hovnanian's Four Seasons at Historic Virginia
49	Four Seasons-Historic	16158 Dancing Leaf Place, Prince William County	VA		10/13/2004 to Present	VAR101439		K. Hovnanian's Four Seasons at Historic

Confidential Business Information

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4	Property Name	Site Location	State	Acres	Dates of Construction	NPDES Permit No.	E&S Plan Approval	Responding Entity
50	Four Seasons-Historic VA- Phase 8, Section 1	3931 Great Harvest Court, Prince William County	VA	22.61	12/29/2004 to Present	VAR101439	12/7/2004	K. Hovnanian's Four Seasons at Historic Virginia
51	Four Seasons-Historic VA-Sanitary Outfall	Prince William County	VA	5.75	2002 - Present	VAR431057	4/3/2001	K. Hovnanian's Four Seasons at Historic Virginia
52	Fox Chase	Brooke Lane & Tudor Rd., Prince George's County	MD	6.88	2004 to Present	Permit Application Submitted	6/30/2003; SC 406-03	K. Hovnanian Homes of Maryland, LLC
53	Fox Run	Old State and Mennonite Roads Upper Providence	PA	92	3/2002 to 9/2003	PAR1OT591	1/14/00; 1/19/01	K. Hovnanian Eastern Pennsylvania, LLC
54	Garrison Woods	Meyers Road, Triangle	VA	33	1/2005 to Present	Permit Application Submitted	7/15/2004	K. Hovnanian Homes of Virginia, Inc.
55	Gilley Terrace	Spring Rd., Baltimore County	MD	7.9	2004 to Present	04-BA-0097	1/14/2004	K. Hovnanian Homes of Maryland, LLC
56	Glenkirk Section 1	Glenkirk Road, Gainesville	VA	9	2/2003 - 1/2005	VAR101612	10/2/2002	K. Hovnanian Homes of Virginia, Inc.
57	Hampstead Landing	Possum Point Road, Dumfries	VA	20.11	9/2004 - 3/2005	VAR103155	8/20/2004	K. Hovnanian Homes of Virginia, Inc.

## For Information Presented in the Response to The Section 308 Request on National City - West

I certify that the foregoing responses on the above-referenced project(s) were prepared under my direction or supervision and that I have personal knowledge of all matters set forth in the responses. I certify that the responses on the above-referenced project(s) contained in this submission is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Christopher Tranchetti

## For Information Presented in the Response to The Section 308 Request on Elm Tree (Four Seasons at Elm Tree)

I certify that the foregoing responses on the above-referenced project(s) were prepared under my direction or supervision and that I have personal knowledge of all matters set forth in the responses. I certify that the responses on the above-referenced project(s) contained in this submission is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Iim Vance

#### For Information Presented in the Response to The Section 308 Request on Hidden Pond Singles

I certify that the foregoing responses on the above-referenced project(s) were prepared under my direction or supervision and that I have personal knowledge of all matters set forth in the responses. I certify that the responses on the above-referenced project(s) contained in this submission is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Mike Kniedy Dale Walker